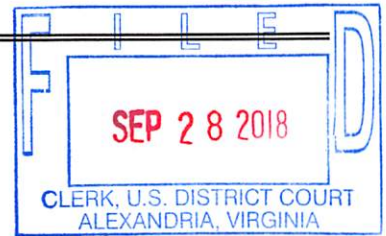


**UNDER SEAL**  
**UNITED STATES DISTRICT COURT**  
 for the  
 Eastern District of Virginia



United States of America )

v. )

Case No. 1:18-MJ-464 )

ELENA ALEKSEEVNA KHUSYAYNOVA )

Defendant(s) )

### CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of the year 2014 until the present in the county of Alexandria in the  
Eastern District of Virginia, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 371

Conspiracy to defraud the United States

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Reviewed by AUSA/SAUSA:

AUSA Jay Prabhu; SAUSA Alex Iftimie

*David Holt*  
 Complainant's signature

David Holt, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 28 Sep 18

City and state: Alexandria, Virginia

*ICD* /s/

Ivan D. Davis  
 United States Magistrate Judge